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## PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Worwag Coatings, LLC**  
**555 Sagamore Parkway South**  
**Lafayette, Indiana 47905-4737**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T157-7590-00037	
Issued by: Original signed by Janet G. McCabe Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: March 20, 2002  Expiration Date: March 20, 2007

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## SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary paint and allied products manufacturing plant.

Responsible Official:	Norbert Stratkemper
Source Address:	555 Sagamore Parkway South, Lafayette, Indiana 47905-4737
Mailing Address:	P.O. Box 4449, Lafayette, Indiana 47903-4449
SIC Code:	2851
County Location:	Tippecanoe County
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) Sixty five (65) mixers, identified as EU1 - EU45, EU51 - EU69, and EU126, using no control, with the following maximum capacities and exhaust vents:

Mixer I.D.	Installation Date	Maximum Capacity (gallons/batch)	Exhaust Vent I.D.
EU1	12/49	480	V13 - V17
EU2	12/49	670	
EU3	12/49	450	
EU4	12/49	600	
EU5	7/76	400	
EU6	9/73	400	
EU7, EU8	5/84	400	
EU9	9/89	400	
EU10, EU11	8/87	400	
EU12	7/89	50	
EU13	7/89	200	
EU14 - EU16	6/86	400	V5
EU17 - EU22	4/87	400	
EU23	1949	400	
EU24 - EU27	1949	150	
EU28 - EU31	1949	150	atmosphere

EU32 - EU33	1949	55	atmosphere
EU34	8/89	400	V1 - V2
EU35	1949	150	
EU36	1949	400	
EU37, EU39	11/78	649	
EU40 EU41	8/90 1949	900	
EU38 EU42 EU43 - EU45	11/78 12/79 1949	1000	
EU51 EU52 - EU53	8/67 1950	400	V3
EU54 - EU56, EU57 - EU58 EU59 - EU60, EU64	11/78 9/66 1950	1000	
EU61 - EU62	1950	600	
EU63, EU66	8/90	1500	
EU67 - EU68	1950	2500	
EU69	1950	1100	atmosphere
EU126	12/96	400	V1 - V2

- (b) Two (2) spray paint booths, identified as EU47 and EU48, each with a maximum capacity of coating 3.96 and 5.60 gallons per hour, respectively, both constructed before 1990, each using dry filters for particulate matter control, and each exhausting through vents V9A, and V10.
- (c) One (1) spray paint booth, identified as EU46, constructed in 2000, with a maximum capacity of 3.96 gallons per hour, using dry filters for particulate matter control, and exhausting through vent V9.

A.3 Specifically Regulated Insignificant Activities [326 IAC 6-2-4] [ 326 IAC 2-7-1(21)] [ 326 IAC 2-7-5(15)] [ 326 IAC 2-7-4(c)]

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This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
  - (1) one (1) natural gas fired boiler, constructed in October 1995, identified as EU125a, used to heat the manufacturing area, rated at 2.511 MMBtu per hour and exhausting through one (1) vent identified as V12; [326 IAC 6-2-4]  
  
*Note: EU125a may use No. 1 fuel oil as an alternative fuel. Potential to emit (PTE) of pollutants was calculated for both fuels. The higher PTE of each pollutant was used in the calculations for total source PTE.*
  - (2) one (1) natural gas fired boiler, constructed in October 1995, identified as EU125, rated at 4.2 MMBtu per hour and exhausting through one (1) vent identified as V12. [326 IAC 6-2-4]

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

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This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## SECTION B

## GENERAL CONDITIONS

### B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

### B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

### B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

### B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

### B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

### B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall furnish to IDEM, OAQ within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]
- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1 When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

**B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]**

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- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
  - (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; or
  - (3) Denial of a permit renewal application.
- (b) Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.
- (c) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

**B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]**

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- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

**B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]**

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- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]  
[326 IAC 1-6-3]

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
    - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
    - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
    - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee’s control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

**B.12 Emergency Provisions [326 IAC 2-7-16]**

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,  
Compliance Section), or  
Telephone Number: 317-233-5674 (ask for Compliance Section)  
Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;

- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

**B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]**

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ has issued the modification. [326 IAC 2-7-12(b)(7)]

**B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

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- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

**B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]**

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- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

- (b) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

**B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination**  
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

**B.17 Permit Renewal** [326 IAC 2-7-4]

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
  - (1) A timely renewal application is one that is:
    - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]  
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]  
If IDEM, OAQ fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

**B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]**

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- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
  
Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]**

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- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

**B.21 Source Modification Requirement [326 IAC 2-7-10.5]**

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A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-7-10.5.

**B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]**

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Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy any records that must be kept under the conditions of this permit;
- (c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

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- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source
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### Emission Limitations and Standards [326 IAC 2-7-5(1)]

- C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]  
Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- C.2 Opacity [326 IAC 5-1]  
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]  
The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.
- C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]  
The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.
- C.5 Fugitive Dust Emissions [326 IAC 6-4]  
The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.
- C.6 Operation of Equipment [326 IAC 2-7-6(6)]  
Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.
- C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]
- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
  - (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
  - (A) Asbestos removal or demolition start date;
  - (B) Removal or demolition contractor; or
  - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34). The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) Procedures for Asbestos Emission Control  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) Indiana Accredited Asbestos Inspector  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

### **Testing Requirements [326 IAC 2-7-6(1)]**

#### **C.8 Performance Testing [326 IAC 3-6]**

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- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

#### **Compliance Requirements [326 IAC 2-1.1-11]**

##### **C.9 Compliance Requirements [326 IAC 2-1.1-11]**

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The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

#### **Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

##### **C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

##### **C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

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Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

## **Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

### **C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

### **C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]**

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

All documents submitted pursuant to this condition shall include the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

### **C.14 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]**

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.

- (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
  - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
  - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
  - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
  - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
  - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]  
[326 IAC 2-7-6]

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]  
[326 IAC 2-6]

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- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
  - (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
  - (2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.

- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

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- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

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- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

## **Stratospheric Ozone Protection**

### **C.19 Compliance with 40 CFR 82 and 326 IAC 22-1**

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Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]:

Sixty five (65) mixers, identified as EU1 - EU45, EU51 - EU69, and EU126, using no control, with the following maximum capacities and exhaust vents:

Mixer I.D.	Installation Date	Maximum Capacity	Exhaust Vent I.D.
EU1	12/49	480	V13 - V17
EU2	12/49	670	
EU3	12/49	450	
EU4	12/49	600	
EU5	7/76	400	
EU6	9/73	400	
EU7, EU8	5/84	400	
EU9	9/89	400	
EU10, EU11	8/87	400	
EU12	7/89	50	
EU13	7/89	200	
EU14 - EU16	6/86	400	V5
EU17 - EU22	4/87	400	
EU23	1949	400	
EU24 - EU27	1949	150	
EU28 - EU31	1949	150	atmosphere
EU32 - EU33	1949	55	atmosphere
EU34	8/89	400	V1 - V2
EU35	1949	150	
EU36	1949	400	
EU37, EU39	11/78	649	
EU40 EU41	8/90 1949	900	
EU38 EU42 EU43 - EU45	11/78 12/79 1949	1000	
EU51 EU52 - EU53	8/67 1950	400	V3
EU54 - EU56, EU57 - EU58 EU59 - EU60, EU64	11/78 9/66 1950	1000	
EU61 - EU62	1950	600	
EU63, EU66	8/90	1500	
EU67 - EU68	1950	2500	
EU69	1950	1100	atmosphere
EU126	12/96	400	V1 - V2

## **Emission Limitations and Standards [326 IAC 2-7-5(1)]**

### **D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6] [326 IAC 8-6-2]**

- (a) Mixer units EU7 - EU22, EU 34, EU40, EU63, EU66 and EU126 shall each use less than 1,250 tons of VOC per 12 consecutive month period. These limits are required to limit VOC emissions of each mixer to less than 25 tons (based on the emission factor of 0.02 lb of VOC/lb VOC used ) per 12 consecutive month period. Therefore, the requirements of 326 IAC 8-1-6 do not apply.
- (b) Mixer units EU5, EU37-EU39, EU42 and EU 54-EU56 combined shall use less than 5000 tons of VOC per 12 consecutive month period. This limit is required to limit VOC emissions for these mixers to less than 100 tons (based on the emission factor of 0.02 lb of VOC/lb VOC used) per 12 consecutive month period. Therefore, the requirements of 326 IAC 8-6-1(2) do not apply.

### **D.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]**

The mixing operation shall use less than 11,105 tons of VOC per 12 consecutive month period, based on an emission factor of 0.02. This usage limit is required to limit the potential to emit of VOC from mixing operation to less than 222.10 tons per 12 consecutive month period. Compliance with this limit in conjunction with the requirement of Condition D.2.1, shall limit source wide VOC emissions to less than 250 tons per consecutive 12 month period and make 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

### **D.1.3 Hazardous Air Pollutants (HAPs)**

Pursuant to the Clean Air Act of 1990, the United States Environmental Protection Agency (U.S. EPA) has established the Manufacture of Paints, Coatings, and Adhesives as a source category requiring HAP control and established November 15, 2000 as the final rule promulgation date. The rule will apply to all major paint, coating and adhesive manufacturing HAP sources (i.e., emits or has the potential to emit 10 tons per year and 25 tons per year of single and combined HAPs, respectively). Since the source is a major source of HAP emissions, it will evaluate applicability to the standards, limits, and testing, monitoring, record keeping and reporting requirements of the final rule upon its promulgation and will comply as required.

## **Compliance Determination Requirements**

### **D.1.4 Volatile Organic Compounds (VOC)**

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

### **D.1.5 VOC Emissions**

Compliance with Conditions D.1.1 and D.1.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

## **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

### **D.1.6 Volatile Organic Compound (VOC) Usage**

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1 and D.1.2.

- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The cleanup solvent usage for each month;
  - (4) The total VOC usage for each month; and
  - (5) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.7 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

## SECTION D. 2

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]:

Two (2) paint spray booths, identified as EU47 and EU48, each with a maximum coating usage capacity of 3.96 and 5.60 gallons per hour, respectively, both constructed before 1990, each using dry filters for particulate matter control, and each exhausting through vents V9A, and V10;

One (1) paint spray booth, identified as EU46, constructed in 2000, with a maximum coating usage capacity of 3.96 gallons per hour, using dry filters for particulate matter control, and exhausting through vent V9.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.2.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21] [326 IAC 8-2-9] [326 IAC 8-1-6]

VOC usage for the spray booths shall be limited as follows:

- (a) Spray booths EU47, EU48 and EU50 combined shall use less than 25 tons of VOC per 12 consecutive month period.
- (b) Spray paint booth EU46 shall use less than 15.0 lbs of VOC per day (equivalent to a maximum VOC usage of 2.74 tons per 12 consecutive month period).

These usage limits are required to limit the potential to emit of VOC from the surface coating operation to less than 27.74 tons per 12 consecutive month period. Compliance with the above limits in conjunction with the requirement of Condition D.1.2, shall limit source wide VOC emissions to less than 250 tons per consecutive 12 month period and make 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable. Compliance with the above limits shall also render 326 IAC 8-2-9 and 326 IAC 8-1-6 not applicable

#### D.2.2 Hazardous Air Pollutants (HAPs)

Pursuant to the Clean Air Act of 1990, the United States Environmental Protection Agency (U.S. EPA) has established the Manufacture of Paints, Coatings, and Adhesives as a source category requiring HAP control and established November 15, 2000 as the final rule promulgation date. The rule will apply to all major paint, coating and adhesive manufacturing HAP sources (i.e., emits or has the potential to emit 10 tons per year and 25 tons per year of single and combined HAPs, respectively). Since the source is a major source of HAP emissions, it will evaluate applicability to the standards, limits, and testing, monitoring, record keeping and reporting requirements of the final rule upon its promulgation and will comply as required.

#### D.2.3 Particulate Matter Overspray [326 IAC 6-3-2]

The dry filters shall be in operation at all times that the paint booths are in operation and pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the lean-to paint coating operation shall be limited by the following:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

## **Compliance Determination Requirements**

### **D.2.4 Volatile Organic Compounds (VOC)**

Compliance with the VOC content and usage limitations contained in Conditions D.2.1 and D.2.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

### **D.2.5 VOC Emissions**

Compliance with Conditions D.2.1 and D.2.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

## **Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

### **D.2.6 Particulate Matter (PM)**

In order to comply with D.2.3, the overspray control filter chamber for PM control shall be in operation at all times when the four (4) paint booths (EU46, EU47, EU48 and EU50) are in operation.

### **D.2.7 Monitoring**

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the paint booth stacks (V9A, V9, V10) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

## **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

### **D.2.8 Volatile Organic Compound (VOC) Usage**

- (a) To document compliance with Condition D.2.1 the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.2.1.
  - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The cleanup solvent usage for each month;

- (4) The total VOC usage for each month; and
  - (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.2.7, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit

#### D.2.9 Reporting Requirements

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A quarterly summary of the information to document compliance with Condition D.2.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

### SECTION D.3

### FACILITY OPERATION CONDITIONS

**Facility Description [326 IAC 2-7-5(15)]:**

(a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:

- (1) one (1) natural gas fired boiler, constructed in October 1995, identified as EU125a, used to heat the manufacturing area, rated at 2.511 MMBtu per hour and exhausting through one (1) vent identified as V12; [326 IAC 6-2-4]

*Note: EU125a may use No. 1 fuel oil as an alternative fuel. Potential to emit (PTE) of pollutants was calculated for both fuels. The higher PTE of each pollutant was used in the calculations for total source PTE.*

- (2) one (1) natural gas fired boiler, constructed in October 1995, identified as EU125, rated at 4.2 MMBtu per hour and exhausting through one (1) vent identified as V12. [326 IAC 6-2-4]

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

**Emission Limitations and Standards [326 IAC 2-7-5(1)]****D.3.1 Particulate Matter (PM) [ 326 IAC 6-2-4]**

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating, the PM emissions from each of the two (2) boilers (one boiler rated at 2.511 MMBtu/hr and another boiler rated at 4.2 mmBtu/hr) shall each be limited 0.6 lb/mmBtu.

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

### PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Worwag Coatings, LLC  
Source Address: 555 Sagamore Parkway South, Lafayette, IN 47905-4737  
Mailing Address: P.O. Box 4449, Lafayette, IN 47903-4449  
Part 70 Permit No.: 157-7590-000037

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) \_\_\_\_\_

9 Report (specify) \_\_\_\_\_

9 Notification (specify) \_\_\_\_\_

9 Affidavit (specify) \_\_\_\_\_

9 Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
100 North Senate Avenue  
P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT**

Source Name: Worwag Coatings, LLC  
Source Address: 555 Sagamore Parkway South, Lafayette, IN 47905-4737  
Mailing Address: P.O. Box 4449, Lafayette, IN 47903-4449  
Part 70 Permit No.: 157-7590-00037

**This form consists of 2 pages**

**Page 1 of 2**

- |   |  |
|---|--|
| 9 | This is an emergency as defined in 326 IAC 2-7-1(12)   |
| C | The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and            |
| C | The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16. |

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

**Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report**

Source Name: Worwag Coatings LLC  
Source Address: 555 Sagamore Parkway South, Lafayette, IN 47905-4737  
Mailing Address: P.O. Box 4449, Lafayette, IN 47903-4449  
Part 70 Permit No.: T157-7590-00037  
Facility: Mixer units EU7 - EU22, EU 34, EU40, EU63, EU66 and EU126  
Parameter: VOC  
Limit: VOC usage of less than 1,250 tons per 12 consecutive month period for each unit, which is equivalent to VOC emissions of less than 25 tons per 12 consecutive month period (based on the emission factor of 0.02 lb of VOC / lb VOC used).

YEAR: \_\_\_\_\_ MIXER: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Emission This Month	VOC Emission Previous 11 Months	VOC Emission 12 Month Total
Month 1			
Month 2			
Month 3			

(Prepare separate report for each unit)

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title/Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report**

Source Name: Worwag Coatings LLC  
Source Address: 555 Sagamore Parkway South, Lafayette, IN 47905-4737  
Mailing Address: P.O. Box 4449, Lafayette, IN 47903-4449  
Part 70 Permit No.: T157-7590-00037  
Facility: Mixing Operations  
Parameter: VOC  
Limit: VOC usage of less than 11,105 tons per 12 month period, which is equivalent to VOC emissions of less than 222.10 tons per 12 consecutive month period (based on the emission factor of 0.02 lb of VOC / lb VOC used).

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Emission This Month	VOC Emission Previous 11 Months	VOC Emission 12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title/Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report**

Source Name: Worwag Coatings LLC  
Source Address: 555 Sagamore Parkway South, Lafayette, IN 47905-4737  
Mailing Address: P.O. Box 4449, Lafayette, IN 47903-4449  
Part 70 Permit No.: T157-7590-00037  
Facility: Mixer units EU5, EU37-EU39, EU42 and EU 54-EU56  
Parameter: VOC  
Limit: VOC usage of less than 5,000 tons per 12 consecutive month period for all units combined which is equivalent to VOC emissions of less than 100 tons per 12 consecutive month period (based on the emission factor of 0.02 lb of VOC / lb VOC used).

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Emission This Month	VOC Emission Previous 11 Months	VOC Emission 12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report**

Source Name: Worwag Coatings LLC  
Source Address: 555 Sagamore Parkway South, Lafayette, IN 47905-4737  
Mailing Address: P.O. Box 4449, Lafayette, IN 47903-4449  
Part 70 Permit No.: T157-7590-00037  
Facility: Three (3) Paint Booths EU47, EU48 and EU50.  
Parameter: VOC  
Limit: Combined VOC usage of less than 25 tons per 12 consecutive month period for all units.

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Emission This Month	VOC Emission Previous 11 Months	VOC Emission 12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title/Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**Part 70 Monthly Report**

Source Name: Worwag Coatings LLC  
Source Address: 555 Sagamore Parkway South, Lafayette, IN 47905-4737  
Mailing Address: P.O. Box 4449, Lafayette, IN 47903-4449  
Part 70 Permit No.: T157-7590-00037  
Facility: One (1) Paint Booth EU46  
Parameter: VOC  
Limit: Actual VOC usage of less than 15.0 pounds per day

Month: \_\_\_\_\_ Year: \_\_\_\_\_

Day	VOC Emission (lbs/day)	Day	VOC Emission (lbs/day)
1		17	
2		18	
3		19	
4		20	
5		21	
6		22	
7		23	
8		24	
9		25	
10		26	
11		27	
12		28	
13		29	
14		30	
15		31	
16		No. of deviations	

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Worwag Coatings, LLC  
Source Address: 555 Sagamore Parkway South, Lafayette, IN 47905-4737  
Mailing Address: P.O. Box 4449, Lafayette, IN 47903-4449  
Part 70 Permit No.: 157-7590-00037

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

## Indiana Department of Environmental Management Office of Air Quality

### Addendum to the Technical Support Document (TSD) for a Part 70 Permit

<b>Source Name:</b>	Worwag Coatings, LLC
<b>Source Location:</b>	555 Sagamore Parkway South, Lafayette, Indiana 47903-4449
<b>SIC Code:</b>	2851
<b>County:</b>	Tippecanoe
<b>Operation Permit No.:</b>	T157-7590-00037
<b>Permit Reviewer:</b>	Alic Bent /EVP

On December 5, 2001, the Office of Air Quality (OAQ) had a notice published in the Lafayette Journal & Courier, Indiana, stating that Worwag Coatings LLC had applied for a Part 70 permit for the operation of an industrial organic chemical coatings manufacturing plant. The notice also stated that OAQ proposed to issue a Part 70 Permit for this operation and provided information on how the public could review the proposed Part 70 Permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Part 70 Permit should be issued as proposed.

Upon further review, the OAQ has decided to make the following changes to the Part 70 Permit. Bolded language has been added and the language with a line through it has been deleted.

1. Condition B.7 (Duty to Supplement and Provide Information) was revised to change a rule reference. Subpart (c) references 326 IAC 17. This rule was repealed by the Air Pollution Control Board on January 26, 2000. The new rule reference has been added as follows:
 

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

(c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.
2. Condition B.8 (Compliance with Permit Conditions, now renumbered B.8) (d) was changed in past model revisions to change "condition" to "Section". Since Section B conditions are often renumbered, the language was meant to be more general. However, "condition" implies a specific reference, whereas "section" is more general. The language should read "Section," since there is no longer a specific condition reference. Condition B.8) (b) has been added to clarify that noncompliance with any requirement of this permit may result in an enforcement action against the Permittee, an action to modify, revoke, reissue or terminate the source's permit, and/or a denial of the Permittee's application to renew the permit. In addition, except for those permit conditions that are not federally enforceable, noncompliance is also a violation of the federal Clean Air Act.
 

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(b) **Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.**

- (bc) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (ed) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in ~~condition~~ **Section B, Emergency Provisions**.

3. Condition B.13 (Permit Shield) has been revised to add a word for clarification.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed **in** compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

4. Condition B.18 (Permit Amendment or Modification) has been changed to replace “should” with “shall” in subpart (b). The Office of Legal Counsel has advised that the use of the word “shall” is more enforceable and will prevent sources from indicating they aren’t required to certify.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Any such application ~~should~~ **shall** be certified by the “responsible official” as defined by 326 IAC 2-7-1(34).

5. Condition B.20 (Operational Flexibility) has been changed to clarify the reason a certification is not required.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;

- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

**The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore,** the notification ~~which shall be submitted~~ by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

6. Condition B.24 (Annual Fee Payment) has been changed to add “to” in subpart (a) as follows:

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant **to** 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.

7. Condition C.7 (Asbestos Abatement Projects) has been revised to clarify the enforceability of accreditation. 326 IAC 14-10 (Emission Standards for Asbestos) was not submitted as a SIP and not approved. Therefore, this requirement that an inspector be “Indiana” accredited cannot be federally enforceable. However, the requirement that the inspector be accredited is a provision of 40 CFR 61, Subpart M. Therefore, the following revision has been made to clarify what is federally enforceable.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (f) Indiana Accredited Asbestos Inspector  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, **pursuant to the provisions of 40 CFR 61, Subpart M**, is federally enforceable.

8. Condition C.18 (General Reporting Requirements) has been changed to indicate all forms instead of the choice between quarterly or semi-annual.

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (d) Unless otherwise specified in this permit, ~~any quarterly~~ **all** reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. ~~The All reports does do~~ require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

9. Condition B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

The IDEM, OAQ, has revised Condition B.15 Deviations from Permit Requirements and Conditions to address concerns regarding the independent enforceability of permit conditions [see 40 CFR 70.6(a)(6)(i)]. B.15 was revised to remove language that could be considered to grant exemptions from permit requirements and to clarify reporting obligations.

**B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]**

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. ~~Deviations that are required to be reported by an applicable requirement~~ **A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit**, shall be reported according to the schedule stated in the applicable requirement and ~~do~~ **does** not need to be included in this report.

The ~~notification by the Permittee~~ **Quarterly Deviation and Compliance Monitoring Report** does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit ~~or a rule. It does not include:~~

- ~~(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~
- ~~(2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.~~
- ~~A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.~~

- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

**10. Condition C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]**

**Condition C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]**

Part 70 requires any application form, report, or compliance certification to be certified by the Responsible Official. IDEM, OAQ has revised C.7 Asbestos Abatement Projects to clarify that the asbestos notification does not require a certification by the responsible official, but it does need to be certified by the owner or operator. IDEM, OAQ has revised C.15 Actions Related to Noncompliance Demonstrated by a Stack Test; a certification by the responsible official is required for the notification sent in response to non-compliance with a stack test.

**C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]**

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
  - (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34). The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]  
[326 IAC 2-7-6]

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

11. Condition B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

Addition of the new rule cite to B.2 Permit Term.

B.2 Permit Term [326 IAC 2-7-5(2)] **[326 IAC 2-1.1-9.5]**

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This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

12. Condition B.12 Emergency Provisions [326 IAC 2-7-16]

Condition B.12 Emergency Provisions (a)(b) and (g) have been revised to reflect rule changes to 326 IAC 2-7-16. This section of the rule is now consistent with 40 CFR 70.6(g) and provides an affirmative defense to an action brought for non-compliance with technology based emission limitations only.

B.12 Emergency Provisions [326 IAC 2-7-16]

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, ~~except as provided in 326 IAC 2-7-16.~~
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a ~~health-based or~~ technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (g) ~~Operations may continue during an emergency only if the following conditions are met:~~

- 
- (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

~~(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:~~

~~(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and~~

~~(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.~~

~~Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.~~

13. Condition B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Condition B.14 Multiple Exceedances has been deleted, because 326 IAC 2-7-5(1)(E) has been repealed, because it conflicted with 40 CFR 70.6(a)(6).

~~B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]~~

~~Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.~~

14. Condition B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

Condition B.14 Prior Permit Conditions Superseded was added to the permit to implement the intent of the new rule 326 IAC 2-1.1-9.5.

**B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

**(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either**

**(1) incorporated as originally stated,**

**(2) revised, or**

**(3) deleted**

**by this permit.**

**(b) All previous registrations and permits are superseded by this permit.**

15. Condition B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

Condition B.13 (b) Permit Shield has been removed. Since B.14 Prior Permits Superseded has been added to the permit, it is not necessary for this statement to be in this condition.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

~~(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.~~

16. Condition C.14 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

Condition C.14 which was inadvertently omitted from the draft permit has been added and the subsequent conditions renumbered.

**C.14 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]**

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- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
  - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.
  - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
  - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
  - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
  - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
  - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
  - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

- (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.**
- (3) An automatic measurement was taken when the process was not operating.**
- (4) The process has already returned or is returning to operating within “normal” parameters and no response steps are required.**
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.**
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.**
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.**

## Indiana Department of Environmental Management Office of Air Quality

### Technical Support Document (TSD) for a Part 70 Operating Permit

#### Source Background and Description

**Source Name:** Worwag Coatings LLC  
**Source Location:** 555 Sagamore Parkway South, Lafayette, Indiana 47903-4449  
**County:** Tippecanoe  
**SIC Code:** 2851  
**Operation Permit No.:** T157-7590-00037  
**Permit Reviewer:** Alic Bent/EVP

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from Worwag Coatings LLC relating to the operation of an industrial organic chemical coatings manufacturing plant.

#### Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) Sixty five (65) mixers, identified as EU1 - EU45, EU51 - EU69, and EU126, using no control, with the following maximum capacities and exhaust vents:

Mixer I.D.	Installation Date	Maximum Capacity (gallons/batch)	Exhaust Vent I.D.
EU1	12/49	480	V13 - V17
EU2	12/49	670	
EU3	12/49	450	
EU4	12/49	600	
EU5	7/76	400	
EU6	9/73	400	
EU7, EU8	5/84	400	
EU9	9/89	400	
EU10,EU11	8/87	400	
EU12	7/89	50	
EU13	7/89	200	
EU14 - EU16	6/86	400	V5
EU17 - EU22	4/87	400	
EU23	1949	400	

EU24 - EU27	1949	150	
EU28 - EU31	1949	150	atmosphere
EU32 - EU33	1949	55	atmosphere
EU34	8/89	400	V1 - V2
EU35	1949	150	
EU36	1949	400	
EU37, EU39	11/78	649	
EU40 EU41	8/90 1949	900	
EU38 EU42 EU43 - EU45	11/78 12/79 1949	1000	
EU51 EU52 - EU53	8/67 1950	400	V3
EU54 - EU56, EU57 - EU58 EU59 - EU60, EU64	11/78 9/66 1950	1000	
EU61 - EU62	1950	600	
EU63, EU66	8/90	1500	
EU67 - EU68	1950	2500	
EU69	1950	1100	atmosphere
EU126	12/96	400	V1 - V2

- (b) Two (2) paint spray booths, identified as EU47 and EU48, each with a maximum coating usage capacity of coating 3.96 and 5.60 gallons per hour, respectively, both constructed in 1988, each using dry filters for particulate matter control, and each exhausting through vents V9A, and V10;
- (c) One (1) paint spray booth, identified as EU50, constructed in 1969, with a maximum coating usage capacity of 5.60 gallons per hour, using dry filters for particulate matter control, and exhausting through vent V9A .

#### Unpermitted Emission Units and Pollution Control Equipment

The source also consists of the following unpermitted facilities/units which, pursuant to 326 IAC 2-7-10.5(d)(9), should have received a minor source modification:

- (a) One (1) paint spray booth, identified as EU46, constructed in 2000, with a maximum coating usage capacity of 3.96 gallons per hour, using dry filters for particulate matter control, and exhausting through vent V9.
- (b) One (1) mixer, identified as EU126, constructed in 1996, with a maximum capacity of 400 gallons per batch, exhausting through vent V1 -V2.

## Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
  - (1) one (1) natural gas fired boiler, constructed in October 1995, identified as EU125a, used to heat the manufacturing area, rated at 2.511 MMBtu per hour and exhausting through one (1) vent identified as V12; [326 IAC 6-2-4]  
  
*Note: EU125a may use No. 1 fuel oil as an alternative fuel. Potential to emit (PTE) of pollutants was calculated for both fuels. The higher PTE of each pollutant was used in the calculations for total source PTE.*
  - (2) one (1) natural gas fired boiler, constructed in October 1995, identified as EU125, rated at 4.2 MMBtu per hour and exhausting through one (1) vent identified as V12; [326 IAC 6-2-4]
- (b) Fuel oil-fired combustion sources with heat input equal to or less than two million (2,000,000) Btu per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight;
- (c) Gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons;
- (d) Solvent recycling systems with batch capacity less than or equal to 100 gallons;
- (e) Process vessel degassing and cleaning to prepare for internal repairs;
- (f) Paved and unpaved roads and parking lots with public access; [326 IAC 6-4]
- (g) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower;
- (h) A laboratory as defined in 326 IAC 2-7-1(20)(C);
- (i) Other categories with emissions below significant levels:
  - (1) Eight (8) volatile organic liquid (VOL) storage tanks, constructed March 1966, identified as EU75 - EU82, each with a maximum capacity of 3024 gallons, using no control, and exhausting to vents V18 - V25, respectively;
  - (2) Six (6) volatile organic liquid (VOL) storage tanks, identified as EU86 - EU90, constructed November 1978, and EU91, constructed March 1990, each with a maximum capacity of 1199 gallons, using no control, and exhausting to vents V29 - V34, respectively;
  - (3) Two (2) volatile organic liquid (VOL) storage tanks, constructed March 1966, identified as EU83 - EU84, each with a maximum capacity of 1512 gallons, using no control, and exhausting to vents V26 - V27, respectively;
  - (4) One (1) volatile organic liquid (VOL) storage tank, constructed December 1965, identified as EU85, with a maximum capacity of 1537 gallons, using no control, and exhausting to vent V28;

- (5) Two (2) volatile organic liquid (VOL) storage tanks, constructed March 1990, identified as EU92 - EU93, each with a maximum capacity of 799 gallons, using no control, and exhausting to vents V35 - V36, respectively; and
- (6) One (1) volatile organic liquid (VOL) storage tank, constructed March 1990, identified as EU94, with a maximum capacity of 2592 gallons, using no control, and exhausting to vent V37.

### Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) OP 79-01-94-0455, issued on March 27, 1990;
- (b) Registration (not numbered), issued on March 13, 1986; and
- (c) OP 79-01-90-0370, issued on February 20, 1986.

All conditions from previous approvals were incorporated into this Part 70 permit.

### Enforcement Issue

- (a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment*.
- (b) IDEM is reviewing this matter and will take appropriate action.

### Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on December 13, 1996. Additional information was received on June 18, 2001.

A notice of completeness letter was mailed to the source on January 8, 1997.

### Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided in Appendix A of this document pages 1 through 8.

## Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	16.50
PM-10	16.60
SO <sub>2</sub>	3.36
VOC	8,348.5
CO	2.47
NO <sub>x</sub>	3.41

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Toluene	greater than 10
Xylene	greater than 10
Methyl Ethyl Ketone	greater than 10
Ethylene Benzene	greater than 10
Methyl Isobutyl Ketone	greater than 10
TOTAL	greater than 25

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions  
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

## Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1999 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	not reported
PM-10	not reported
SO <sub>2</sub>	not reported
VOC	14.0
CO	not reported
NO <sub>x</sub>	not reported
HAP (specify)	not reported

## Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 operating permit.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Mixing Operations	0.00	0.00	0.00	< 222.10	0.00	0.00	< 225.0
Surface Coating Operations	16.28	16.28	0.00	< 27.74	0.00	0.00	< 25.0
Combustion	0.19	0.22	3.36	0.16	2.47	3.41	0.00
Tank Farm Fugitive Emissions	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total Emissions	16.50	16.60	3.36	< 250	2.47	3.41	< 250

## County Attainment Status

The source is located in Tippecanoe County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Tippecanoe County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

- (b) Tippecanoe County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions  
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

### Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

### Federal Rule Applicability

- (a)
  - (1) None of the volatile organic liquid storage tanks (listed under item (i) of "Insignificant Activities") at this source are subject to the New Source Performance Standard 326 IAC 12, (40 CFR Part 60.110, Subpart Kb) "Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction, or Modification Commenced after July 23, 1984". All the volatile organic compounds storage tanks at this source, except (EU91 - EU94) were constructed or modified prior to July 23, 1984 and are therefore not subject to this rule. The remaining storage tanks (EU91 - EU94), were constructed after 1984, but are not subject to the requirements of this rule because the capacity of each of the storage tanks is less than 40 cubic meters.
  - (2) This source is not subject to the requirements of the New source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc), as there are no boilers at the source with a heat input greater than 10 MMBtu per hour.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 20 and 40 CFR Part 63) currently applicable to this source. However, pursuant to the Clean Air Act of 1990, the United States Environmental Protection Agency (U.S. EPA) has established the Manufacture of Paints, Coatings, and Adhesives as a source category requiring HAP control and established November 15, 2000 as the final rule promulgation date. The rule will apply to all major paint, coating and adhesive manufacturing HAP sources (i.e., emits or has the potential to emit 10 tons per year and 25 tons per year of single and combined HAPs, respectively). Since the source is a major source of HAP emissions, it will evaluate applicability to the standards, limits, and testing, monitoring, record keeping and reporting requirements of the final rule upon its promulgation and will comply as required.

### State Rule Applicability - Entire Source

#### 326 IAC 1-6-3 (Preventive Maintenance Plan)

The source has submitted a Preventive Maintenance Plan (PMP) on December 13, 1996. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

#### 326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

This source is not one of the 28 listed sources and was constructed prior to August 7, 1980. Since 1980 the source has installed the following emission units:

- (a) EU7 and EU8 in 1984, operated under OP 79-01-90-0370, issued on February 20, 1986.
- (b) EU14 - EU16 in 1986, operated under OP 79-01-90-0370, issued on February 20, 1986.
- (c) EU10, EU11, EU17 - EU22 in 1987, operated under OP 79-01-94-0455, issued on March 27, 1990;
- (d) EU9, EU12, EU14, EU34, EU47 and EU48 in 1989, operated under OP 79-01-94-0455, issued on March 27, 1990;
- (e) EU40, EU63 and EU66 in 1990, operated under OP 79-01-94-0455, issued on March 27, 1990;
- (f) EU126 and EU46 in 1996 and 2000, respectively, both unpermitted.

Based on the source's emission records, the source has always been a PSD minor with VOC emissions remaining at less than 250 tons per year since the source was originally constructed. For this Title V permit review, the source shall limit the source wide VOC usage of coatings, dilution solvents, and cleaning solvents, such that the source wide potential to emit of VOC is limited to less than 250 tons per 12 consecutive month period. The source shall:

- (a) use less than 11,105 tons of VOC, including coatings, dilution solvents, and cleaning solvents per 12 consecutive month period for the mixing operation. This usage limit is required to limit the potential to emit of VOC to less than 222.10 tons (based on an emission factor of 0.02 lb of VOC / lb VOC used) per 12 consecutive month period from the mixing operations;

*(The emission factor of 0.02 lb of VOC per lb VOC used is based on the National Paint and Coatings Association "Emission Estimation Guidance Manual for the Paint and Coatings Industry" 2<sup>nd</sup> edition 1995).*

- (b) use less than 27.74 tons of VOC, and cleaning solvents per 12 consecutive month period for the paint spray booths ( spray booths EU47, EU48 and EU50 combined are limited to less than 25 tons per 12 month period and spray booth EU46 is limited to less than 2.74 ton per 12 month period). This usage limit is required to limit the potential to emit of VOC to less than 27.74 tons (based on an emission factor of 1 lb of VOC/lb VOC used) per 12 consecutive month period from the surface coating operations.

Compliance with these limits make 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

**326 IAC 2-6 (Emission Reporting)**

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

**326 IAC 5-1 (Opacity Limitations)**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**326 IAC 8-6 (Organic Solvent Emission Limitations)**

Provisions of 326 IAC 8-6 (Organic Solvent Emission Limitations) apply to units commencing operation after October 7, 1974, and prior to January 1, 1980, with potential emissions of 100 tons per year or greater of VOC, and not limited by any other 326 IAC 8 rules.

Mixer units EU5, EU37-EU39, EU42 and EU 54-EU56 commenced operation between 1974 and 1980 and total VOC usage for these mixers shall be limited to less than 5000 tons of VOC per 12 consecutive month period. This limit is required to limit VOC emissions for these mixers to less than 100 tons (based on the emission factor of 0.02 lb of VOC/lb VOC used) per 12 consecutive month period.

Therefore, the requirements of 326 IAC 8-6-2 do not apply.

**State Rule Applicability - Individual Facilities**

**326 IAC 2-4.1-1 (New Source Toxics Control)**

Pursuant to 326 IAC 2-4.1 (New Source Toxics Control), any new process or production unit, which in and of itself emits or has the potential to emit (PTE) 10 tons per year of any HAP or 25 tons per year of any combination of HAPs, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT). All current operations at this plant were constructed before the rule applicability date of July 27, 1997. Therefore, these facilities are not subject to the requirements of 326 IAC 2-4.1-1.

**326 IAC 6-3-2 (Process Operations)**

The particulate matter (PM) from the four (4) spray paint booths (EU46, EU47, EU48 and EU50) shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The dry filters shall be in operation at all times the spray paint booths are in operation, in order to comply with this limit.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

Provisions of 326 IAC 8-1-6 apply to facilities located in any county constructed after January 1, 1980, which are not otherwise regulated by any other provisions of 326 IAC 8, and have potential VOC emissions of 25 tons per year or greater.

Mixer units EU1 - EU6, EU23 - EU33, EU35 - EU39, EU41 - EU45, EU51 - EU62, EU64 - EU65, and EU67 - EU69 are not subject to this rule because these units were constructed prior to January 1, 1980.

Mixer units EU7 - EU22, EU 34, EU40, EU63, EU66 and EU126 were installed after 1980 and are independent of each other for the manufacturing of products and shall each use less than 1,250 tons of VOC per 12 consecutive month period. This limit is required to limit VOC emissions for each mixer to less than 25 tons (based on the emission factor of 0.02 lb of VOC/lb VOC used) per 12 consecutive month period. Therefore, the requirements of 326 IAC 8-1-6 do not apply.

Two (2) Paint Booths EU47 and EU48, were constructed after November 1, 1980 and prior to July 1990 and are both potentially subject to the requirements of 326 IAC 8-1-6 for coating non-metallic materials because each booth VOC is greater than 25 TPY. Pursuant to Condition D.2.1(a), total VOC input usage at spray booths EU47, EU48 and EU50 shall be limited to less than 25 tons per 12 consecutive month period.

Compliance with this limitation shall also make the requirements of 326 IAC 8-1-6 not applicable to facilities EU47 and EU48 for coating non-metals.

One (1) Paint Booth EU46, was constructed after July 1990 and shall use actual VOC of less than 2.74 tons per 12 consecutive month period for the coating of both non-metals and metals. Therefore, the requirements of 326 IAC 8-1-6 do not apply when coating non-metals.

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

The two (2) boilers (one boiler rated at 2.511 MMBtu/hr and another boiler rated at 4.2 mmBtu/hr) were both constructed after September 21, 1983 (both were constructed in October, 1995), and shall be limited by the following equation:

$$Pt = \frac{1.09}{Q^{0.26}} = \frac{1.09}{6.711^{0.26}} = 0.665 \text{ lb/mmBtu}$$

where: Q = total source rated capacity in mmBtu/hr

The allowable particulate emission rate from each of the two (2) boilers, based on the above equation, is 0.665 lb/mmBtu. Pursuant to 326 IAC 6-2-4(a) for boilers with capacity rating less than 10 mmBtu/hr, the allowable PM emissions is 0.6 lb/mmBtu. Therefore, PM emissions for each of the two (2) boilers are limited to 0.6 lb/mmBtu. Each of the two (2) boilers emits a maximum of 0.014 pounds of PM per MMBtu heat input and is in compliance with 326 IAC 6-2-4.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

Paint Booth EU50 is not subject to 326 IAC 8-2-9 ( for the coating of metals) because it was constructed in 1969.

Two (2) Paint Booths EU47 and EU48, were constructed after November 1, 1980 and prior to July 1990 and are both potentially subject to the requirements of 326 IAC 8-2-9 for coating metallic materials. Pursuant to Condition D.2.1(a), total VOC input usage at spray booths EU47, EU48 and EU50 shall be limited to less than 25 tons per 12 consecutive month period. Pursuant to 326 IAC 8-2-1(a)(2), compliance with this limitation shall also make the requirements of 326 IAC 8-2-9 not applicable to facilities EU47 and EU48.

One (1) Paint Booth EU46, was constructed after July 1990 and shall use actual VOC of less than 15.0 lbs per day for the coating of both metals and non-metals. Therefore, pursuant to 326 IAC 8-2-1(a)(4), the requirements of 326 IAC 8-2-9 do not apply when coating metals.

**326 IAC 8-4 (Petroleum Sources)**

This organic liquid storage operation is not subject to the provisions of this rule. The storage tanks are not used to store petroleum liquid. Also, the source is located in Tippecanoe County and therefore not subject to the requirements of 326 IAC 8-4.

**326 IAC 8-9-1 (Volatile Organic Liquid Storage Vessels)**

Pursuant to 326 IAC 8-9-1, on and after October 1, 1995 stationary vessels used to store volatile organic liquids (VOL) must comply with the requirements of the rule if located in Clark, Floyd, Lake or Porter Counties. The source is located in Tippecanoe County and therefore not subject to the requirements of 326 IAC 8-9-1.

**Compliance Requirements**

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

1. The paint booths have applicable compliance monitoring conditions as specified below:
  - (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the paint booths stacks (V9, V9A and V10) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
  - (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit

These monitoring conditions are necessary because the dry filters for the paint spray booths must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-8 (FESOP).

### **Conclusion**

The operation of this industrial organic chemical coatings manufacturing plant shall be subject to the conditions of the attached proposed **Part 70 Permit No. T157-7590-00037**.

## Appendix A: Emission Calculations

**Company Name:** Worwag Coatings, LLC  
**Address City IN Zip:** 555 Sagamore Parkway South, Lafayette, IN  
**Title V:** 157-7590-00037  
**Plt ID:** 157-00037  
**Reviewer:** Alic Bent / EVP  
**Date:** August 1, 2001

Uncontrolled Potential Emissions (tons/year)					
Emissions Generating Activity					
Pollutant	Combustion EU125a and EU125	Mixing Operations EU1-EU45, EU51-EU69, EU126	Surface Coating EU46-EU48 and EU50	Tank Farm Fugitive Emissions	TOTAL
PM	0.19	0.00	16.28	0.00	16.5
PM10	0.30	0.00	16.28	0.00	16.6
SO2	3.36	0.00	0.00	0.00	3.4
NOx	3.41	0.00	0.00	0.00	3.4
VOC	0.16	7,695.12	653.20	0.00	8,348.5
CO	2.47	0.00	0.00	0.00	2.5
total HAPs	3.23E-02	5,950.64	371.12	0.00	6,321.8
worst case single HAP	1.98E-02	0.00	0.00	0.00	0.0
Total emissions based on rated capacity at 8,760 hours/year.					
Controlled Potential Emissions (tons/year)					
Emissions Generating Activity					
Pollutant	Combustion EU125a and EU125	Mixing Operations EU1 - EU69, EU126	Surface Coating EU46 - EU48, EU50	Tank Farm Fugitive Emissions	TOTAL
PM	0.19	0.00	16.28	0.00	16.47
PM10	0.30	0.00	16.28	0.00	16.50
SO2	3.36	0.00	0.00	0.00	3.36
NOx	3.41	0.00	0.00	0.00	3.41
VOC	0.16	< 222.10	< 27.74	0.00	< 250
CO	2.47	0.00	0.00	0.00	2.47
total HAPs	3.23E-02	< 225	< 25.0	0.00	< 250
Total emissions based on rated capacity at 8,760 hours/year, after control.					
VOC limit of less than 250 tons per 12 consecutive month period is necessary to avoid the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration)					

**Appendix A: Emission Calculations  
VOC/HAP Emissions  
Mixing Operations**

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**Company Name: Worwag Coatings, LLC  
Address City IN Zip: 555 Sagamore Parkway South, Lafayette, IN  
Title V: 157-7590-00037  
Plant ID: 157-00037  
Reviewer: Alic Bent/EVP  
Date: August 1, 2001**

Emission Unit	Maximum Rate lb/hr	Emission Factor	Actual VOC Emissions ton/year	Actual HAP Emissions ton/year	Potential VOC Emissions ton/year	Potential HAP Emissions ton/year
EU1	1263.13	0.02	0.32	0.16	110.65	55.45
EU2	1793.49	0.02	0.54	0.24	157.11	70.31
EU3	1167.35	0.02	0.33	0.15	102.26	45.88
EU4	1773.40	0.02	0.55	0.24	155.35	68.27
EU5	1164.50	0.02	0.30	0.21	102.01	70.89
EU6	873.86	0.02	0.20	0.21	76.55	78.59
EU7	873.86	0.02	0.20	0.21	76.55	78.59
EU8	873.86	0.02	0.20	0.21	76.55	78.59
EU9	873.86	0.02	0.20	0.21	76.55	78.59
EU10	873.86	0.02	0.20	0.21	76.55	78.59
EU11	873.86	0.02	0.20	0.21	76.55	78.59
EU12	271.69	0.02	0.06	0.06	23.80	24.24
EU13	445.09	0.02	0.11	0.11	38.99	38.84
EU14	873.86	0.02	0.20	0.21	76.55	78.59
EU15	873.86	0.02	0.20	0.21	76.55	78.59
EU16	873.86	0.02	0.20	0.21	76.55	78.59
EU17	873.86	0.02	0.20	0.21	76.55	78.59
EU18	873.86	0.02	0.20	0.21	76.55	78.59
EU19	873.86	0.02	0.20	0.21	76.55	78.59
EU20	873.86	0.02	0.20	0.21	76.55	78.59
EU21	873.86	0.02	0.20	0.21	76.55	78.59
EU22	873.86	0.02	0.20	0.21	76.55	78.59
EU23	873.86	0.02	0.20	0.21	76.55	78.59
EU24	476.94	0.02	0.10	0.11	41.78	45.93
EU25	476.94	0.02	0.10	0.11	41.78	45.93
EU26	476.94	0.02	0.10	0.11	41.78	45.93
EU27	476.94	0.02	0.11	0.11	41.78	45.93
EU28	476.94	0.02	0.11	0.11	41.78	45.93
EU29	476.94	0.02	0.11	0.11	41.78	45.93
EU30	476.94	0.02	0.11	0.11	41.78	45.93
EU31	476.94	0.02	0.11	0.11	41.78	45.93
EU32	271.69	0.02	0.06	0.06	23.80	24.24
EU33	271.69	0.02	0.06	0.06	23.80	24.24
EU34	2055.71	0.02	0.15	0.15	180.08	113.72
EU35	1040.41	0.02	0.08	0.08	91.14	51.36
EU36	2055.71	0.02	0.15	0.15	180.08	113.72
EU37	3237.33	0.02	0.24	0.24	283.59	163.83

\* See page 3 for notes.

**Appendix A: Emission Calculations  
VOC/HAP Emissions  
Mixing Operations**

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**Company Name: Worwag Coatings, LLC  
Address City IN Zip: 555 Sagamore Parkway South, Lafayette, IN  
Title V: 157-7590-00037  
Plant ID: 157-00037  
Reviewer: Alic Bent/EVP  
Date: August 1, 2001**

Emission Unit	Maximum Rate lb/hr	Emission Factor	Actual VOC Emissions ton/year	Actual HAP Emissions ton/year	Potential VOC Emissions ton/year	Potential HAP Emissions ton/year
EU38	3237.33	0.02	0.24	0.24	283.59	163.83
EU39	3237.33	0.02	0.24	0.24	283.59	163.83
EU40	3237.33	0.02	0.24	0.24	283.59	163.83
EU41	3237.33	0.02	0.24	0.24	283.59	163.83
EU42	3237.33	0.02	0.24	0.24	283.59	163.83
EU43	3237.33	0.02	0.24	0.24	283.59	163.83
EU44	3237.33	0.02	0.24	0.24	283.59	163.83
EU45	3237.33	0.02	0.24	0.24	283.59	163.83
EU51	873.86	0.02	0.20	0.21	76.55	78.59
EU52	873.86	0.02	0.20	0.21	76.55	78.59
EU53	873.86	0.02	0.20	0.21	76.55	78.59
EU54	1354.22	0.02	0.33	0.32	118.63	114.54
EU55	1354.22	0.02	0.33	0.32	118.63	114.54
EU56	1354.22	0.02	0.33	0.32	118.63	114.54
EU57	1354.22	0.02	0.33	0.32	118.63	114.54
EU58	1354.22	0.02	0.33	0.32	118.63	114.54
EU59	1354.22	0.02	0.33	0.32	118.63	114.54
EU60	1354.22	0.02	0.33	0.32	118.63	114.54
EU61	1354.22	0.02	0.33	0.32	118.63	114.54
EU62	1354.22	0.02	0.33	0.32	118.63	114.54
EU63	1354.22	0.02	0.33	0.32	118.63	114.54
EU64	1354.22	0.02	0.33	0.32	118.63	114.54
EU65	1354.22	0.02	0.33	0.32	118.63	114.54
EU66	1354.22	0.02	0.33	0.32	118.63	114.54
EU67	1354.22	0.02	0.33	0.32	118.63	114.54
EU68	1354.22	0.02	0.5	0.32	118.63	75.69
EU69	3237.33	0.02	0.71	0.41	283.59	164.15
EU126	1164.50	0.02	0.30	0.21	102.01	70.96

<b>Total =</b>	15.65	14.13	7695.12	5950.64
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**Notes:**

See permit application for a complete list of all HAPs and HAP emission rates.

This table summarizes potential and actual VOC and HAP emissions for the mixing operations.

The five (5) worst case HAPs are listed in the Technical Support Document (TSD).

Emission Factor of 0.02 used from the National Paint and Coating Association "Emission Estimation Guidance Manual for the Paint and Coatings Industry" 2nd edition 1995.

**Appendix A: Emission Calculations**

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**HAP Emissions****Surface Coating Operations****Company Name: Worwag Coatings, LLC****Address City IN Zip: 555 Sagamore Parkway South, Lafayette, IN****Title V: 157-7590-00037****Plant ID: 157-00037****Reviewer: Alic Bent/EVP****Date: August 1, 2001**

Emission Unit	Maximum Rate lb/hr	Emission Factor lb/lb	Actual HAP Emissions ton/year	Actual VOC Emissions ton/year	Potential HAP Emissions ton/year	Potential VOC Emissions ton/year
EU46	30.89	1.00	1.38	2.44	76.86	135.29
EU47	43.68	1.00	0.54	0.95	108.70	191.31
EU48	43.68	1.00	0.54	0.95	108.70	191.31
EU50	30.89	1.00	0.68	1.19	76.86	135.29

<b>Total =</b>			<b>3.14</b>	<b>5.53</b>	<b>371.12</b>	<b>653.20</b>
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**Notes:**

See permit application for a complete list of all HAPs and HAP emission rates.

This table summarizes potential and actual VOC and HAP emissions for the surface coating operations.

The five (5) worst case HAPs are listed in the Technical Support Document (TSD).

Worst case HAP emissions were used from all coatings produced.

**Appendix A: Emissions Calculations**  
**Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)**  
**#1 and #2 Fuel Oil or Natural Gas Combustion (EU125a)**

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**Company Name: Worwag Coatings, LLC**  
**Address, City IN Zip: 555 Sagamore Parkway South, Lafayette, IN 47905-4737**  
**Title V: 157-7590-00037**  
**Plt ID: 157-00037**  
**Reviewer: Alic Bent/EVP**  
**Date: August 1, 2001**

**Natural Gas Combustion**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr					
2.5	22.0					
Emission Factor in lb/MMCF	PM*	PM10*	SO2	NOx **	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
Potential Emission in tons/yr	0.02	<b>0.08</b>	0.01	1.10	<b>0.06</b>	<b>0.92</b>

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

\*\*\*This boiler can use either natural gas or #1 fuel oil as an alternative fuel.

**\*\*\*Worst case potential emissions are in bold for each pollutant.**

**Methodology**

All emission factors are based on normal firing.

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

**No. 1 and No. 2 Fuel Oil**

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year		S = Weight % Sulfur		
2.511	157.12		0.3		
Emission Factor in lb/kgal	PM*	SO2	NOx	VOC	CO
	2.0	42.6	20.0	0.34	5.0
Potential Emission in tons/yr	<b>0.16</b>	<b>3.35</b>	<b>1.57</b>	0.03	0.39

**Methodology**

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM Btu

Emission Factors are from AP 42, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-03-005-01/02/03) Supplement E 9/98 (see erata file)

\*PM emission factor is filterable PM only. Condensable PM emission factor is 1.3 lb/kgal.

**Appendix A: Emissions Calculations**  
**Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)**  
**#1 and #2 Fuel Oil and Natural Gas Combustion (EU125a)**  
**HAPs Emissions**

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**Company Name: Worwag Coatings, LLC**  
**Address, City IN Zip: 555 Sagamore Parkway South, Lafayette, IN 47905-4737**  
**Title V: 157-7590-00037**  
**Plt ID: 157-00037**  
**Reviewer: Alic Bent/EVP**  
**Date: August 1, 2001**

**Natural Gas Combustion**

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	<b>2.310E-05</b>	<b>1.320E-05</b>	<b>8.249E-04</b>	<b>1.980E-02</b>	<b>3.739E-05</b>

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	5.499E-06	1.210E-05	1.540E-05	4.179E-06	2.310E-05

Methodology is the same as page 5.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**No. 1 and No. 2 Fuel Oil**

HAPs - Metals

	Arsenic	Beryllium	Cadmium	Chromium	Lead
Emission Factor in lb/mmBtu	4.0E-06	3.0E-06	3.0E-06	3.0E-06	9.0E-06
Potential Emission in tons/yr	<b>4.40E-05</b>	<b>3.30E-05</b>	<b>3.30E-05</b>	<b>3.30E-05</b>	<b>9.90E-05</b>

HAPs - Metals (continued)

	Mercury	Manganese	Nickel	Selenium
Emission Factor in lb/mmBtu	3.0E-06	6.0E-06	3.0E-06	1.5E-05
Potential Emission in tons/yr	<b>3.30E-05</b>	<b>6.60E-05</b>	<b>3.30E-05</b>	<b>1.65E-04</b>

**Methodology**

No data was available in AP-42 for organic HAPs.

Potential Emissions (tons/year) = Throughput (mmBtu/hr)\*Emission Factor (lb/mmBtu)\*8,760 hrs/yr / 2,000 lb/ton

\*\*\*This boiler can use either natural gas or #1 fuel oil as an alternative fuel.

\*\*\***Worst case potential emissions are in bold for each pollutant.**

**Appendix A: Emissions Calculations**

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**Natural Gas Combustion Only****MM BTU/HR <100****Small Industrial Boiler (EU125)****Company Name: Worwag Coatings, LLC****Address City IN Zip: 555 Sagamore Parkway South, Lafayette, IN****CP: 157-7590-00037****Plt ID: 157-00037****Reviewer: Alic Bent/EVP****Date: August 1, 2001**Heat Input Capacity  
MMBtu/hrPotential Throughput  
MMCF/yr

4.2

36.8

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.03	0.14	0.01	1.84	0.10	1.55

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03  
(SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only**

Page 8 of 8 TSD App A

**MM BTU/HR <100**

**Small Industrial Boiler (EU125)**

**HAPs Emissions**

**Company Name: Worwag Coatings, LLC**

**Address City IN Zip: 555 Sagamore Parkway South, Lafayette, IN**

**Title V: 157-7590-00037**

**Plt ID: 157-00037**

**Reviewer: Alic Bent/EVP**

**Date: August 1, 2001**

**HAPs - Organics**

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	3.863E-05	2.208E-05	1.380E-03	3.311E-02	6.255E-05

**HAPs - Metals**

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	9.198E-06	2.024E-05	2.575E-05	6.990E-06	3.863E-05

Methodology is the same as page 7.

The five highest organic and metal HAPs emission factors are provided above.  
Additional HAPs emission factors are available in AP-42, Chapter 1.4.